IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA

PURVIS, and VERAKA STURDIVANT on behalf of themselves and all others similarly situated,)))
Plaintiffs,) CA No. 3:21-cv-00112-FDW-DSC
VS.)))
VALLEY PROTEINS, INC.,)
Defendant.)
)

PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF THE COLLECTIVE AND CLASS ACTION SETTLEMENT

For the reasons set forth in the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of the Class and Collective Action Settlement ("Motion for Final Approval"), Plaintiffs respectfully request the Court enter an Order:

- (1) Granting final approval of the Parties' Stipulation of Settlement and Release (Dkt. 105-1, Exhibit A), including the class action settlement pursuant to Fed. R. Civ. P. 23 and the Fair Labor Standards Act (FLSA) collective action settlement contained therein; and
 - (2) Granting any other relief that the Court deems just and proper.

Plaintiffs have contemporaneously submitted a Proposed Order, attached hereto, for the Court's convenience.

Respectfully submitted this July 26, 2022.

/s/ Gilda Adriana Hernandez
Gilda A. Hernandez (NCSB No. 36812)
Charlotte C. Smith (NCSB No. 53616)

THE LAW OFFICES OF GILDA A. **HERNANDEZ, PLLC**

1020 Southhill Drive, Suite 130 Cary, NC 27513

Tel: 919 741-8693 Fax: 919 869-1853

ghernandez@gildahernandezlaw.com csmith@gildahernandezlaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2022, I filed the foregoing true and accurate copy of

PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF THE

COLLECTIVE AND CLASS ACTION SETTLEMENT with the Court using the CM/ECF

system, and thereby electronically served the document to the following:

Andrew J. Henson (NCSB No. 49266) TROUTMAN PEPPER HAMILTON SANDERS LLP

1001 Haxall Point, Suite 1500 Richmond, VA 23219 Phone: (804) 697-1390 Facsimile: (804) 697-1339

andrew.henson@troutman.com

Ashley Z. Hager (Georgia Bar No. 784505) Emily E. Schifter (Georgia Bar No. 767888) TROUTMAN PEPPER HAMILTON

TROUTMAN PEPPER HAMILTON SANDERS LLP

Bank of America Plaza 600 Peachtree Street, NE, Suite 3000 Atlanta, GA 30308 Tel: (404) 885-3000

Facsimile: (404) 885-3900 ashley.hager@troutman.com emily.schifter@troutman.com

Attorneys for Defendant

/s/ Gilda Adriana Hernandez

Gilda A. Hernandez (NCSB No.: 36812) Charlotte C. Smith (NCSB No.: 53616) THE LAW OFFICES OF GILDA A. HERNANDEZ, PLLC

1020 Southhill Dr., Ste. 130 Cary, NC 27513

Tel: (919) 741-8693 Fax: (919) 869-1853

<u>ghernandez@gildahernandezlaw.com</u> csmith@gildahernandezlaw.com

Attorneys for Plaintiffs